

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
GLOBAL EXPEDITED PACKAGE SERVICES 3 (MC2010-28)
NEGOTIATED SERVICE AGREEMENTS

Docket No.
CP2012-31

**MOTION OF THE UNITED STATES POSTAL SERVICE FOR TEMPORARY RELIEF
CONCERNING A GLOBAL EXPEDITED PACKAGE SERVICES 3
NEGOTIATED SERVICE AGREEMENT**
(June 17, 2013)

The agreement that is the subject of this docket was originally scheduled to expire on June 10, 2013.¹ On May 24, 2013, the Postal Regulatory Commission (Commission) issued Order No. 1732, granting the Postal Service's motion to allow the agreement that is the subject of this docket continue until June 30, 2013.²

The Postal Service intended to file a successor contract to the agreement that is the subject of this docket with ample time for the Commission to complete its 15-day review by July 1, 2013. Although the Postal Service took steps to avoid any interruption in its ability to provide the customer access to negotiated rates, the Parties were not able to execute the successor contract until June 13, 2013, and the Postal Service is filing today the successor contract in Docket No. CP2013-68.³ As a result, there will be a gap between the expiration of the agreement that is the subject of this

¹ United States Postal Service Response to Order No. 1363 concerning Effective Dates of a Global Expedited Package Services 3 Negotiated Service Agreement, Docket No. CP2012-31, June 7, 2012.

² PRC Order No. 1732, Order Granting Motion for Temporary Relief, Docket No. CP2012-31, May 24, 2013.

³ See Notice of United States Postal Service of Filing a Functionally Equivalent Global Expedited Package Services 3 Negotiated Service Agreement and Application for Non-Public Treatment of Materials Filed Under Seal, Docket No. CP2013-68, June 17, 2013.

docket (June 30, 2013), and the effective date of the successor agreement, while the Commission completes its review. Thus, the customer faces the prospect of an interruption in its access to negotiated rates as a result of the processes that the customer must participate in when it does business with the Postal Service, rather than with one of the Postal Service's competitors.

To avoid this result, the Postal Service respectfully requests that the Commission grant an extension to allow the contract that is the subject of this agreement to remain on the competitive product list until 11:59pm on July 7, 2013, so that the Postal Service is able to notify the customer that the Commission has reviewed the successor agreement and to act on the Postal Service's request to add the successor agreement to the competitive product list as a GEPS 3 product.

Therefore, the Postal Service respectfully requests that the Commission approve a brief extension of the agreement that is the subject of this docket to maintain continuity of pricing and other terms and conditions of the agreement. The Postal Service requests that the existing terms and conditions under the agreement that is the subject of this docket be extended to July 7, 2013.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno

Chief Counsel

Global Business and Service Development

Corporate and Postal Business Law Section

Christopher C. Meyerson

Attorney

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1137
(202) 268-7820; Fax -5628
June 17, 2013